

1 MICHELE BECKWITH  
2 Acting United States Attorney  
3 MATHEW W. PILE, WSBN 32245  
4 Associate General Counsel  
5 Office of Program Litigation, Office 7  
6 Social Security Administration  
7 JUSTIN L. MARTIN, MO 62255  
8 Special Assistant United States Attorney  
9 6401 Security Boulevard  
Baltimore, Maryland 21235  
Telephone: (206) 615-3735  
E-Mail: justin.l.martin@ssa.gov

10 Attorneys for Defendant

11 UNITED STATES DISTRICT COURT

12 EASTERN DISTRICT OF CALIFORNIA

13 SACRAMENTO DIVISION

14 SAMUEL OSEI KWARTENG,

15 Civil No. 2:25-cv-1121-JDP

16 Plaintiff,

17 vs.  
18 COMMISSIONER OF SOCIAL SECURITY,  
19 Defendant.

STIPULATION AND PROPOSED ORDER  
FOR EXTENSION OF TIME TO FILE THE  
ELECTRONIC CERTIFIED  
ADMINISTRATIVE RECORD AS THE  
ANSWER TO PLAINTIFF'S COMPLAINT

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Pending the Court's approval, the parties stipulate through their respective counsel that Defendant, the Commissioner of Social Security (the "Commissioner"), shall have a forty-five-day extension of time to respond to Plaintiff's Complaint in this case from June 23, 2025, up to and including August 7, 2025. In support of this request, the Commissioner respectfully states as follows:

1. Defendant's response to Plaintiff's Complaint is due to be filed by June 23, 2025.

1           Defendant has not previously requested an extension of this deadline.

2       2. In accordance with the Federal Rules of Civil Procedures, recently amended to add

3           Supplemental Rules for Social Security review cases under 42 U.S.C. § 405(g), the

4           Commissioner files a certified administrative record (CAR) as the Answer to a

5           Complaint for review.

6       3. Counsel for the Commissioner has been informed by the client agency, which is the

7           Social Security Administration, Office of Appellate Operations, that the CAR is not

8           fully prepared in this matter. The client agency therefore needs more time to prepare

9           the CAR for the Court's review.

10      4. For this reason, Defendant requests an extension to August 7, 2025 (45 days), to file

11           an Answer or other response in this matter.

12      5. Counsel for the Commissioner has consulted with Plaintiff's counsel who advised that

13           he has no objection to this extension request.

14      6. This request is made in good faith and is not intended to delay the proceedings in this

15           matter.

16      7. I am attempting to preserve limited judicial resources and have applied the most rapid

17           response under the circumstances.

18           WHEREFORE, Defendant requests until August 7, 2025, to respond to Plaintiff's

19           Complaint.

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1 Respectfully submitted,

2 DATE: June 3, 2025

LAW OFFICES OF FRANCESCO BENAVIDES

3 /s/ Francesco Paulo Benavides\*

4 FRANCESCO PAULO BENAVIDES

5 Attorney for Plaintiff

(\*as authorized via email on June 2, 2025)

6 MICHELE BECKWITH

7 Acting United States Attorney

8 MATHEW W. PILE

9 Associate General Counsel

Office of Program Litigation, Office 7

Social Security Administration

12 DATE: June 3, 2025

By

s/ Justin L. Martin

13 JUSTIN L. MARTIN

Special Assistant United States Attorney

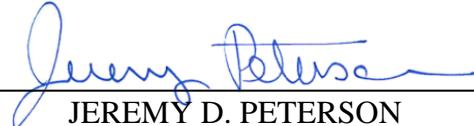
14 Attorneys for Defendant

15 ORDER

16 Pursuant to stipulation, it is so ordered.

19 IT IS SO ORDERED.

20 Dated: June 3, 2025



21 JEREMY D. PETERSON

22 UNITED STATES MAGISTRATE JUDGE